

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION**

<b>In re:</b>	§	<b>Chapter 7</b>
	§	
<b>Q'Max America, Inc., et al<sup>1</sup></b>	§	<b>Case No. 20-60030-CML</b>
	§	
<b>Debtors.</b>	§	<b>Jointly Administered</b>

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**ORDER GRANTING TRUSTEE'S MOTION PURSUANT TO BANKRUPTCY RULE  
9019 FOR ENTRY OF AN ORDER APPROVING COMPROMISE AND SETTLEMENT  
WITH VINSON & ELKINS LLP**

(Relates to Doc. No. \_\_\_\_\_)

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**CAME FOR CONSIDERATION** on the *Motion Pursuant to Bankruptcy Rule 9019 for Entry of an Order Approving Compromise and Settlement with Vinson & Elkins LLP* filed by Trustee.<sup>2</sup> After considering the Motion, all responses thereto, the arguments of counsel and the evidence presented, if any, the Court is of the opinion and finds that: (i) notice of the Motion was in all respects adequate and proper; (ii) the Motion has merit, meets the standard set forth in *Protective Committee's for Independent Stockholders of TMT Trailer Ferry, Inc. v. Anderson*,<sup>3</sup> and (iii) the proposed compromise between Trustee and V&E, as recited in the Motion and as set forth herein, should in all things be approved. Accordingly, it is hereby:

**ORDERED** the Motion is Granted in its entirety; it is further

**ORDERED that** the Settlement Agreement attached as Exhibit A to the Motion is Approved and incorporated herein, and that all matters between the Trustee and V&E are resolved pursuant to the Settlement Agreement (including without limitation all claims brought by Trustee

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification numbers are: Q'Max America Inc. (2319) and Anchor Drilling Fluids USA, LLC (5395).

<sup>2</sup> Defined terms utilized herein shall have the same meaning ascribed to them in the Motion.

<sup>3</sup> 390 U.S. 414 (1967).

in the Suit and all claims V&E may have under 11 U.S.C. § 502(h) or for attorneys' fees) and the terms thereof shall be binding upon the Trustee and V&E; it is further

**ORDERED** the Court shall retain jurisdiction as to the enforcement of this Order.

SIGNED this \_\_\_\_\_ day of \_\_\_\_\_, 2022.

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Christopher M. Lopez,  
United States Bankruptcy Judge